

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

2024 OCT 28 AM 9:56

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Jane Doe)	
Plaintiff)	Case Number 3:24-cv-1284
)	
v.)	
Brooks Automation US LLC)	
)	Judge
)	
Defendant)	Magistrate Judge

MOTION TO PROCEED UNDER PSEUDONYM AND TO SEAL EXHIBITS AND SENSITIVE COMPLAINT INFORMATION

Plaintiff, proceeding under the pseudonym "Jane Doe," respectfully moves this Court for permission to proceed under a pseudonym in her claims against Defendant Brooks Automation US LLC. Plaintiff also requests that the Court seal all exhibits (A to K) filed in this case, as well as Section D of the complaint form, which contains Plaintiff's sensitive health information. This request is made in good faith to prevent the public disclosure of personal, health, and proprietary corporate information, thereby protecting Plaintiff's identity, safety, and professional reputation.

Grounds for Pseudonymity and Sealing Exhibits

1. Good Cause for Pseudonymity

Plaintiff's case involves serious allegations of discrimination, harassment, retaliation, and defamation by her former employer, Defendant Brooks Automation US LLC. Publicly disclosing Plaintiff's identity could expose her to further retaliation by Defendant or its associates, negatively impacting her future employment opportunities and professional reputation. Plaintiff has already suffered significant reputational harm and emotional distress due to Defendant's retaliatory actions, and public disclosure of her identity in this lawsuit may exacerbate these harms, exposing her to additional scrutiny and compromising her standing within her industry.

2. Risk of Retaliation and Reputational Harm

Plaintiff has reason to believe that Defendant could take additional adverse actions if her identity is disclosed. As an immigrant professional, Plaintiff is particularly vulnerable to potential repercussions, including limitations in future employment opportunities and reputational damage, which may hinder her ability to maintain professional relationships or secure comparable employment. The public nature of these proceedings, along with potential media coverage, could impose unwarranted stigma and cause irreparable harm to Plaintiff's personal and professional life.

3. Legal Precedent Supporting Pseudonymity in Retaliation Cases

Courts have recognized that plaintiffs in sensitive cases, particularly those involving retaliation, discrimination, or risks to personal safety, may be granted permission to proceed under a pseudonym. This accommodation prevents unjust outcomes and shields plaintiffs from undue harm. Plaintiff respectfully requests that the Court allow her to proceed under the pseudonym "Jane Doe," as this is necessary to prevent irreparable harm and preserve her safety, privacy, and professional stability.

4. Good Faith and Assurance of Non-Prejudice to Defendant

Plaintiff files this motion in good faith, without intent to obstruct transparency or unduly limit access to critical information. Plaintiff is committed to complying fully with the Court's requirements and disclosing all necessary evidence, including employment records, financial information, and details of relevant Brooks Automation personnel. This request for pseudonymity is solely intended to protect Plaintiff's identity, not to withhold pertinent information from Defendant. Plaintiff believes this will ensure balanced and fair proceedings, safeguarding both parties' interests.

5. Request to Seal Exhibits A to K and Section D of the Complaint Form

Plaintiff additionally requests that the Court seal all exhibits (A to K) submitted in this case, as they contain sensitive personal information, proprietary corporate data, and private employment records. Plaintiff also requests that Section D of the complaint form, which includes sensitive health information, be sealed to protect her privacy. Public access to these documents could lead to undue harm and privacy violations, impacting both Plaintiff's and Defendant's interests. Sealing these materials would protect against the risk of misuse of sensitive information while preserving the integrity of the proceedings.

Conclusion

For these reasons, Plaintiff respectfully requests that this Court grant her leave to proceed under the pseudonym "Jane Doe," to seal Exhibits A to K and Section D of the complaint form, and to shield her identity and sensitive information from public disclosure throughout this litigation.

Respectfully submitted,

Jane Doe

Jane Doe

10/28/2024